

Exhibit 1

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November 2, 2022

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VIA E-MAIL

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Re: *United States ex rel. Doe, et al., v. Planned Parenthood Federation of America, Inc., et al.*, Case No. 2:21-cv-00022-Z

Dear Andrew and Ray:

For efficiency, I'm writing on behalf of our firm and Arnold & Porter to follow up on the parties' lengthy October 18 meet-and-confer call about your Rule 30(b)(6) Deposition Notices to PPFA and the Affiliate Defendants (collectively, the "Deposition Notices").

As you know, the 2020 amendment to Rule 30(b)(6) requires the parties to "confer in good faith about the matters for examination." Fed. R. Civ. P. 30(b)(6). This requirement is intended to minimize disputes between the parties and clarify the topics for the deposition so the responding party can adequately prepare its designated representatives. *See* Fed. R. Civ. P. 30 Advisory Committee Notes, 2020 Amendment (meet-and-confer requirement added due to concerns about "overlong or ambiguously worded lists of matters for examination and inadequately prepared witnesses").

Defendants are working to ensure that each of their 30(b)(6) witnesses is reasonably prepared to address your topics. But the Deposition Notices, including subparts, include well over 150 topics for examination. And many of the topics encompass such potential breadth that their relevance to this litigation often is not apparent.

Given that Plaintiffs would only be able to spend a few minutes on each topic if they divided their time among them equally, we assume that detail on some of these topics is more important than others. Any assistance you can provide on that front will help to ensure that Plaintiffs are able to obtain the information that they believe they need from each 30(b)(6) deposition.

To facilitate our continued discussions, attached is a spreadsheet that (i) memorializes Defendants' understanding of the 30(b)(6) topics following our meet and confer and (ii) describes Defendants' positions as to what each witness will be prepared to address. We are happy to further discuss your views about any additional information you consider relevant and important for the 30(b)(6) representatives to be prepared to address. But otherwise, we assume these depositions will seek largely general information about these topics, consistent with the approach the parties agreed to during our October 28 meet and confer about Defendants' Rule 30(b)(6) notices issued to the State of Texas and the Texas Health and Human Services Commission.

Very truly yours,

/s/ Danny Ashby

Danny Ashby

cc:

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Defendants' Meet-and-Confer Position Regarding Rule 30(b)(6) Deposition Notices

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
1	[Affiliate Defendant]'s formation, [Affiliate Defendant]'s corporate and organizational structure from 2005 to 2021, and reorganizations or changes thereto.	1	PPFA's formation, PPFA's organizational structure from 2005 to 2021, and reorganizations or changes thereto.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Based on the potential breadth that this Topic could include, Defendants will each provide a Rule 30(b)(6) witness to address it generally and at a high level. If there is specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.
2	[Affiliate Defendant]'s by-laws and articles of incorporation.	2	PPFA's by-laws and articles of incorporation.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Based on the potential breadth that this Topic could include, Defendants will each provide a Rule 30(b)(6) witness to address this Topic generally and at a high level. If there is specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
3	3. [Affiliate Defendant]'s Human Resources Department, Human Resource Organizational Structure, and Human Resource Reporting Requirements.	3	PPFA's Human Resources Department, Human Resource Organizational Structure, and Human Resource Reporting Requirements.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants asked Plaintiffs to articulate the relevance of this topic, and PPFA asked Plaintiffs to clarify how it differs from PPFA Topic 13 (below) so they can prepare any potential Rule 30(b)(6) witness. Plaintiffs agreed to get back to Defendants on both issues.
4	4. [Affiliate Defendant]'s training requirements from 2005-2021.	4	PPFA's training requirements from 2005-2021.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - The phrase "training requirements" is extremely broad and would include training that has nothing to do with Medicaid or, in PPFA's case, any of the Affiliate Defendants. Relator indicated that it anticipates asking about training programs that PPFA conducts for the Affiliates, including training requirements for Affiliate employees that relate to Medicaid or related compliance programs. Defendants will provide a Rule 30(b)(6) witness to address the training requirements Relator identified. If there is additional specific information that Plaintiffs wish to address related to this Topic, Defendants requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
5	[Affiliate Defendant]'s status as a 501(c)(3) tax-exempt organization and obligation to protect the 501(c)(3) tax-exempt status of PPFA.	5	PPFA's status as a 501(c)(3) tax-exempt organization.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants asked Plaintiffs to articulate the relevance of this topic, and Relator stated that it anticipates asking about the requirements that PPFA and each Affiliate Defendant must meet in order to maintain its status as a 501(c)(3) tax-exempt organization. Relator indicated "the general knowledge of [each Defendant's] CFO on this topic is the level of detail" sought. - Defendants will produce a Rule 30(b)(6) witness to confirm each Defendants' status as a 501(c)(3) tax-exempt organization. If there is specific additional relevant information that Plaintiffs wish to address related to this Topic, Defendants requests that Plaintiffs identify it with reasonable particularity.
6	[Affiliate Defendant]'s board of directors' role in adopting, monitoring, and reporting [Affiliate Defendant]'s annual budget.	NA	NA	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants asked about the relevance of this Topic. Relator argued that this Topic goes to the Board's oversight of the Affiliate's annual budget, which purportedly includes Medicaid payments and that this Topic may also be relevant to PPFA's purported involvement in the Affiliate's operations and the "alter ego" issue. - Affiliate Defendants will present a 30(b)(6) witness will address, at a high level, the process for the Affiliate Board's adoption, monitoring, and reporting of the Affiliate Defendant's annual budget and whether, and if so to what extent, PPFA is involved in the Affiliate Board's adoption, monitoring, and reporting of the Affiliate Defendant's annual budget during the relevant timeframe of January 1, 2010 - February 5, 2021 (Relator) and February 5, 2015 - February 5, 2021 (Texas).

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
7	[Affiliate Defendant]'s board members' personal financial contributions to [Affiliate Defendant].	NA	NA	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliates Defendants asked about the relevance of this Topic. In response, Relator claimed that the Topic goes to the Affiliate Board's decision-making process regarding Medicaid, including the purported need to reimburse the State of Texas and that Plaintiffs are entitled to explore the Affiliate Board's decision-making process for the Affiliate's financial decisions and their potential motives for making those decisions during the relevant timeframe of January 1, 2010 - February 5, 2021 (Relator) and February 5, 2015 - February 5, 2021 (Texas). - Affiliate Defendants will present a 30(b)(6) witness to testify about the extent to which Affiliate Defendant's board members are financially impacted personally based on financial decisions made by the Affiliate Defendant during the relevant date range.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
8	[Affiliate Defendant]'s knowledge and understanding of Medicaid program requirements.	6	PPFA's knowledge and understanding of Medicaid program requirements.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA explained that this Topic is overly broad, including because it sweeps in Medicaid program requirements that are applicable to other states not at issue in the litigation. PPFA and PPGC will produce a 30(b)(6) witness to address relevant Texas, Louisiana, and federal Medicaid program requirements during the relevant date range. - PPGT, PPST, PPSA, and PPCC will produce a 30(b)(6) witness to address relevant Texas and federal Medicaid program requirements during the relevant date range. - If there are specific Medicaid laws, rules, regulations, and policies not referenced in the Complaint or Complaint-in-Intervention that Plaintiffs intend to question the witness about in detail or if there is other additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
9	<p>[Affiliate Defendant]'s participation in Texas and Louisiana Medicaid, including, but not limited to:</p> <p>(a) [Affiliate Defendant]'s enrollment in Texas and Louisiana Medicaid;</p> <p>(b) [Affiliate Defendant]'s submission of claims for reimbursement to Texas and Louisiana Medicaid;</p> <p>(c) Communications between Texas and Louisiana Medicaid and [Affiliate Defendant]; and</p> <p>(d) Termination of [Affiliate Defendant] as a provider in Texas and Louisiana Medicaid.</p>	7	<p>PPFA's knowledge of the Planned Parenthood affiliates' participation in Texas and Louisiana Medicaid, including, but not limited to:</p> <p>(a) The affiliates' enrollment in Texas and Louisiana Medicaid;</p> <p>(b) The affiliates' submission of claims for reimbursement to Texas and Louisiana Medicaid;</p> <p>(c) Communications between Texas and Louisiana Medicaid and the affiliates; and</p> <p>(d) Termination of the affiliates as providers in Texas and Louisiana Medicaid.</p>	<p><u>Date Range</u></p> <p>- Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021.</p> <p>- Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021.</p> <p><u>Scope:</u></p> <p>- PPFA will produce a 30(b)(6) witness to address this topic as it relates to the Affiliate Defendants during the relevant date range.</p> <p>- Each Affiliate Defendant will produce a 30(b)(6) witness to address this topic as it relates to that Affiliate Defendant during the relevant date range.</p> <p>- If there is specific additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.</p>

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
10	[Affiliate Defendant]'s knowledge and understanding of the Texas Medicaid Provider Procedures Manual and the Louisiana Medicaid Provider Procedures Manual.	NA	N/A	<p><u>Date Range</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope</u></p> <ul style="list-style-type: none"> - PPGC will produce a 30(b)(6) witness to address PPGC's general knowledge and understanding of the Texas Medicaid Provider Procedures Manual(s) and the Louisiana Medicaid Provider Procedures Manual(s) during the relevant date range. - PPGT, PPST, PPSA, and PPCC will produce a 30(b)(6) witness to address each Affiliate's general knowledge and understanding of the Texas Medicaid Provider Procedures Manual during the relevant date range. - If there are specific aspects of the Texas Medicaid Provider Procedures Manual or the Louisiana Medicaid Provider Procedures Manual that Plaintiffs intend to question the witness about that are not referred to in the Complaint or Complaint-in-Intervention, Affiliate Defendants request that Plaintiffs identify them with reasonable particularity.
11	[Affiliate Defendant]'s knowledge and understanding of the Texas Medicaid Provider Agreements and the Louisiana Medicaid Provider Agreements executed and submitted by [Affiliate Defendant].	NA	N/A	<p><u>Date Range</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope</u></p> <ul style="list-style-type: none"> - PPGC will produce a 30(b)(6) witness to address PPGC's knowledge and understanding of the Texas Medicaid Provider Agreements and Louisiana Medicaid Provider Agreements executed and submitted during the relevant time period. - PPGT, PPST, PPSA, and PPCC will produce a 30(b)(6) witness to address each Affiliate's respective knowledge and understanding of the Texas Medicaid Provider Agreements and Louisiana Medicaid Provider Agreements executed and submitted during the relevant time period. - If there are specific aspects of the Agreements that Plaintiffs intend to question the witness about that are not referred to in the Complaint or

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				Complaint-in-Intervention, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
12	[Affiliate Defendant]'s regulatory compliance practices.	8	PPFA's regulatory compliance practices.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants explained that this Topic is overly broad, including because it would sweep in Defendants' regulatory compliance practices that have nothing to do with Medicaid, and PPFA's regulatory compliance practices that have nothing to do with the Affiliates. Plaintiffs agreed to consider potential limitations for this Topic (e.g., exclude SEC and IRS audit-related compliance). - Affiliate Defendants will produce a 30(b)(6) witness to address regulatory compliance practices related to Texas, Louisiana, or federal Medicaid. If there is additional information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity. - PPFA will produce a 30(b)(6) witness to address regulatory compliance practices related to Texas, Louisiana, or federal Medicaid related to PPFA or the Affiliate Defendants during the relevant date range. If there is additional information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
13	[Affiliate Defendant]'s compliance with Medicaid laws, rules, regulations, and policies.	9	PPFA's and the Planned Parenthood affiliates' compliance with Medicaid laws, rules, regulations, and policies.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA explained that this Topic is overly broad because, among other things, it would involve all Planned Parenthood affiliates. PPFA proposed that the parties agree to limit the Topic to PPFA's compliance with Medicaid and to its knowledge/understanding of compliance with Medicaid by the named Affiliate Defendants in the case. Plaintiffs indicated they would discuss this request and get back to PPFA. - Defendants will each produce a 30(b)(6) witness to address Defendants' compliance with Medicaid laws, rules, regulations and policies during the relevant date range. If there are specific Medicaid laws, rules, regulations, and policies not named in the Complaint or Complaint-in-Intervention that Plaintiffs intend to question the witness about in detail or if there is other additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.
14	14. [Affiliate Defendant]'s process for submission of claims for reimbursement to Texas Medicaid and Louisiana Medicaid from 2005-2021, including but not limited to: <ol style="list-style-type: none"> The person(s) responsible for submitting claims; and The process for reviewing and/or verifying the accuracy of claims. 	NA	NA	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Affiliate Defendants will provide a Rule 30(b)(6) witness to address the identified topics (a) and (b) during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
15	<p>15. [Affiliate Defendant]'s process for refunding or repaying overpayments to Texas Medicaid and Louisiana Medicaid from 2005-2021, including but not limited to:</p> <ul style="list-style-type: none"> a. The person(s) responsible for identifying overpayments; b. The person(s) responsible for remitting overpayments; and c. The person(s) responsible for reviewing, approving, and confirming the remittance of overpayments. 	NA	NA	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Affiliate Defendants will provide a Rule 30(b)(6) witness to address the job title or employee role for each of the identified topics (a) - (c) during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.
16	16. [Affiliate Defendant]'s Risk and Quality Management (RQM) program(s) from 2005-2021.	NA	NA	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants explained that this Topic is overly broad and that the RQM program included programs and activities completely unrelated to this case, such as Information Technology security measures and Customer Satisfaction reviews. Plaintiffs requested more information about the RQM program, and agreed to consider limiting the scope of this Topic. - Affiliate Defendants will each produce a 30(b)(6) witness who will address the RQM program at a high level and will be prepared to address any activities or initiatives of their RQM program relating to claim submission (including review and verification), identification and remittance of overpayments, and compliance with Medicaid laws, rules, and regulations, to the extent that their RQM program addresses these issues. If there is other specific information or sub-topics that Plaintiffs wish to address related to

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
				this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.
17	[Affiliate Defendant]'s Health Care Compliance Program(s) from 2005-2021.	N/A	N/A	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants explained during the meet and confer that Affiliate Defendants will each produce a 30(b)(6) witness who will address their compliance programs during the relevant date range generally and at a high level, and will also address specific aspects of the compliance program that are relevant to the issues in this case.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
18	PPFA's knowledge, control, ownership, oversight, connection, relationship, an/or other involvement with [Affiliate Defendant].	N/A	N/A	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Based on the potential breadth that this Topic could include, Affiliate Defendants will provide a Rule 30(b)(6) witness to address it generally and at a high level. If there is specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
19	[Affiliate Defendant]'s knowledge, relationship, connection, and/or involvement with other Planned Parenthood affiliates or related entities, including but not limited to: a.- d. [Other Affiliate Defendants] e. Planned Parenthood Action Fund; f. BetterHealth; g. Affiliate Risk Management Services (ARMS); h. Policyholders' Trust; i. Afaxys; j. Kaleido Health Systems; k. Planned Parenthood Direct; l. Online Health Services; m. Planned Parenthood Care; and n. Clinical Health Network for Transformation.	10	PPFA's knowledge, control, ownership, oversight, connection, relationship, and/or involvement with other Planned Parenthood affiliated or related entities, including but not limited to: (a) Defendant Affiliates; (b) PP Action Fund; (c) BetterHealth; (d) Affiliate Risk Management Services; (e) Policyholders' Trust; (f) Afaxys; (g) Kaleido Health Systems; (h) PP Direct; (i) Online Health Services; (j) PP Care; and (k) Clinical Health Network for Transformation	<p>Date Range:</p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p>Scope:</p> <ul style="list-style-type: none"> - Defendants object that the term "related entities" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" beyond those specifically named and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. Defendants also object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Defendants explained that this Topic is overly broad and burdensome and requested additional information concerning how it is relevant to the case. Plaintiffs stated that the Topic goes to PPFA and Affiliate Defendants' purported relationships with each other and with Affiliate-related entities, which Plaintiffs claimed is relevant to the "alter ego" issue. Defendants explained that PPFA or an Affiliate Defendant's purported involvement with a third-party entity does not inform--and has no legal relevance to--PPFA's relationship with each Affiliate Defendant. - Defendants will produce a 30(b)(6) witness to explain at a high level each Defendant's relationships with the listed entities ((a)-(n) for Affiliate Defendants and (a)-(k) for PPFA) during the relevant date range. If there is additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
20	Agreements between [Affiliate Defendant] and PPFA, including but not limited to agreements concerning the following: a. Affiliation; b. Revenue sharing; c. Fundraising; d. Legal representation; and e. Disposition of assets after dissolution of [Affiliate Defendant].	N/A	N/A	<p><u>Date Range:</u> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021.</p> <p><u>Scope:</u> - Affiliate Defendants object to this Topic as duplicative of Topic 18. Affiliate Defendants also object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Affiliate Defendants will each produce a 30(b)(6) witness to address the identified sub-topics as they relate to PPFA during the relevant date range. If there is additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.</p>

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
21	<p>Agreements between [Affiliate Defendant] and any Planned Parenthood affiliate or related entity, including but not limited to, agreements concerning the following:</p> <ul style="list-style-type: none"> (a) Affiliation; (b) Revenue sharing; (c) Fundraising; (d) Legal representation; and (e) Disposition of assets after dissolution of affiliate 	11	<p>Agreements between PPFA and any Planned Parenthood affiliate or related entity, including but not limited to, agreements concerning the following:</p> <ul style="list-style-type: none"> (a) Affiliation; (b) Revenue sharing; (c) Fundraising; (d) Legal representation; and (e) Disposition of assets after dissolution of affiliate 	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Defendants explained that this Topic is overly broad and burdensome, including because the term "any Planned Parenthood affiliate or related entity" would require preparation of a Rule 30(b)(6) witness on dozens of entities and Planned Parenthood Affiliates and because the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - PPFA will produce a 30(b)(6) witness to address the identified sub-topics as they relate to the Affiliate Defendants during the relevant date range. - Affiliate Defendants will produce a 30(b)(6) witness to address the identified sub-topics (a)-(e) as they relate to the other Affiliate Defendants during the relevant date range. - If there is additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
22	PPFA's management, control, and/or oversight of [Affiliate Defendant]'s employees and/or other individuals hired by, assigned to, or who provide services to [Affiliate Defendant].	12	PPFA's management, control, and/or oversight of individuals hired by, assigned to, or who provide services to any Planned Parenthood affiliate or related entity.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants will produce a 30(b)(6) witness to address this topic during the relevant date range. If there is specific information that Plaintiffs wish to address related to this Topic that is not identified in another Topic (i.e., Affiliate Topics 22-37), Defendants request that Plaintiffs identify it with reasonable particularity. - PPFA objects to this topic as overly broad and burdensome, including because the term "any Planned Parenthood affiliate or related entity" would require preparation of a Rule 30(b)(6) witness on dozens of entities and Planned Parenthood Affiliates and because the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. PPFA will produce a 30(b)(6) witness to address the Topic as it relates to the Affiliate Defendants during the relevant date range. - If there is specific additional information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
N/A	N/A	13	PPFA's Human Resources Department, Human Resource Organizational Structure, and Human Resource Reporting Requirements pertaining to individuals hired, assigned to, or who provide services to any Planned Parenthood affiliate or related entity.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects to this topic as overly broad and burdensome, including because the term "any Planned Parenthood affiliate or related entity" would require preparation of a Rule 30(b)(6) witness on dozens of entities and Planned Parenthood Affiliates and because the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. PPFA further objects that this Topic is unduly vague because it does not provide sufficient information for PPFA to understand what testimony is being sought. As written, this Topic is duplicative of PPFA Topic 3. - PPFA will produce a 30(b)(6) witness to address this topic as it relates to the Affiliate Defendants during the relevant date range. If there is specific additional information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. <i>See also</i> PPFA Topic 3.
23	Requirements for [Affiliate Defendant] to report employee information to PPFA.	N/A	N/A	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants will produce a 30(b)(6) witness to address this topic during the relevant date range. If there is specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
24	Requirements for [Affiliate Defendant] to obtain approval from PPFA for [Affiliate Defendant] business operations.	N/A	N/A	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Because the term "business operations" is vague and ambiguous, Affiliate Defendants will produce a 30(b)(6) witness to address the Affiliate Defendant's obtaining of approval from PPFA for "business operations" during the relevant date range generally and at a high level. If there is specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
25	25. [Affiliate Defendant]'s training requirements for [Affiliate Defendant] employees and/or other individuals hired by, assigned to, or who provide services to [Affiliate Defendant].	14	PPFA's training requirements for individuals hired by, assigned to, or who provided services to any Planned Parenthood affiliate or related entity from 2005-2021.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object that the phrase "training requirements" also is extremely broad and would include training that has nothing to do with Medicaid or, in PPFA's case, any of the Affiliate Defendants. <i>See also</i> PPFA Topic 4. Relator indicated that it anticipates asking about training programs that PPFA conducts for the Affiliates, including training requirements for Affiliate employees that bear on Medicaid or related compliance programs. Plaintiffs stated that they would try to provide further clarification on this Topic and PPFA Topic 4 so that any Rule 30(b)(6) witness is adequately prepared. - PPFA objects that the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - Defendants will each provide a Rule 30(b)(6) witness to address the training requirements for Affiliate Defendants' employees that bear on Medicaid or related compliance programs and to address general questions about PPFA's training requirements as they relate to the Affiliate Defendants. If there is additional specific information that Plaintiffs wish to address related to these Topics, Defendants requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
N/A		15	PPFA's oversight, direction, and/or control of the business operations of Planned Parenthood affiliates or related entities, including but not limited to Medicaid services provided by Planned Parenthood affiliates or related entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas has agreed to consider limiting the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects that the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. PPFA understand that this Topic is limited to the Affiliate Defendants in the case but that communications directed to multiple Affiliates that include the Affiliate Defendants is also an appropriate subject of questioning. - Subject to that understanding, PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the date range. Plaintiffs stated that they would try to provide further clarification on this Topic and PPFA Topic 4 so that any Rule 30(b)(6) witness is adequately prepared. If there is additional specific information that Plaintiffs wish to address related to these Topics, PPFA requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
26	PPFA's audits of [Affiliate Defendant] from 2005-2021, including but not limited to PPFA's audits to identify fraud risk exposure.	16	PPFA's audits of Planned Parenthood affiliates or related entities from 2005-2021, including but not limited to PPFA's audits to identify fraud risk exposure.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Defendants further object to the term "audits" as unduly vague. - Affiliate Defendants will provide a Rule 30(b)(6) witness to address this Topic during the relevant date range. If are specific audits or particular information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify them with reasonable particularity. - PPFA objects that the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify entities that Plaintiffs consider to be related to "Planned Parenthood" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If are specific audits or other additional specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify them with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
27	<p>Standards, guidelines, rules, and/or regulations set by PPFA as conditions of affiliation by [Affiliate Defendant], including, but not limited to:</p> <p>(a) PPFA's mission and priorities (b) PPFA's standards of affiliation (c) PP Experience (PPX) and In This Together (ITT) Workplace Values and Service Standards (d) PPFA's financial benchmarks (e) Affiliate Development and Accreditation Committee Standard Operating Procedures (f) National Program Support (NPS) Plant (g) PPFA Accounting and Reporting Standards (h) PPFA's Orientation and Training Requirements</p>	17	<p>Standards, guidelines, rules, and/or regulations set by PPFA as conditions of affiliation by Planned Parenthood affiliates, including, but not limited to:</p> <p>(a) PPFA's mission and priorities (b) PPFA's standards of affiliation (c) PP Experience (PPX) and In This Together (ITT) Workplace Values and Service Standards (d) PPFA's financial benchmarks (e) Affiliate Development and Accreditation Committee Standard Operating Procedures (f) National Program Support (NPS) Plant (g) PPFA Accounting and Reporting Standards (h) PPFA's Orientation and Training Requirements</p>	<p><u>Date Range:</u> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021.</p> <p><u>Scope:</u> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Affiliate Defendants also object to this Topic as duplicative of Affiliate Topic 18. - Based on the potential breadth that this Topic could include, Defendants will each provide a Rule 30(b)(6) witness to address the identified sub-topics (a)-(h) generally and at a high level. If there is specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.</p>

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
28	<p>PPFA's review or evaluation of [Affiliate Defendant], including but not limited to:</p> <ul style="list-style-type: none"> (a) PPFA's accreditation review process; (b) PPFA's review of [Affiliate Defendant]'s business operations, financials, and clinical services; (c) PPFA's review of [Affiliate Defendant]'s critical programs; (d) PPFA's Human Resources audits of [Affiliate Defendant]'s personnel files and training records; (e) Creation of affiliate accreditation reports concerning [Affiliate Defendant]; (f) Creation and use of accreditation assessment tools and their contents; (g) Assessment of [Affiliate Defendant]'s compliance with PPFA's accreditation standards; and (h) PPFA's on-boarding/training requirements for Planned Parenthood affiliate entities, including [Affiliate Defendant]. 	18	<p>PPFA's review or evaluation of Planned Parenthood affiliates, including but not limited to:</p> <ul style="list-style-type: none"> (a) PPFA's accreditation review process; (b) PPFA's review of prospective affiliates' business operations, financials, and clinical services; (c) PPFA's review of prospective affiliates' critical programs; (d) PPFA's Human Resources audits of prospective affiliates' personnel files and training records; (e) Creation of affiliate accreditation reports; (f) Creation and use of accreditation assessment tools and their contents; (g) Assessment of prospective affiliates' compliance with PPFA's accreditation standards; and (h) PPFA's on-boarding/training requirements for 	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. - PPFA will provide a Rule 30(b)(6) witness to address the identified sub-topics (a)-(h) as they relate to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will provide a Rule 30(b)(6) witness to address the identified sub-topics (a)-(h) during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
			Planned Parenthood affiliate entities.	

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
29	<p>Documentation and information required to be provided to PPFA by [Affiliate Defendant], including but not limited to:</p> <ul style="list-style-type: none"> (a) Affiliate Accreditation Attestation Forms; (b) Quarterly Affiliate Financial Reports (QAFR); (c) Quarterly Volume Reports (Q-VOL); (d) Monthly Volume Reports (MVOL); (e) Financial audits; (f) A-133 compliance reports; (g) Annual Affiliate Financial Reports (AAFR); (h) Data and information in the Data Analytics Database (DAD); (i) Annual Affiliate Services Censuses (AASC); (j) Payments to the National Insurance Program; (k) Affiliate Risk Management Services, Inc. (ARMS) reports; and (l) Affiliate Accounting and Reporting Standards Assessment and Planning Tools. 	19	<p>Documentation and information required to be provided to PPFA by Planned Parenthood affiliates, including but not limited to:</p> <ul style="list-style-type: none"> (a) Affiliate Accreditation Attestation Forms; (b) Quarterly Affiliate Financial Reports (QAFR); (c) Quarterly Volume Reports (Q-VOL); (d) Monthly Volume Reports (MVOL); (e) Financial audits; (f) A-133 compliance reports; (g) Annual Affiliate Financial Reports (AAFR); (h) Data and information in the Data Analytics Database (DAD); (i) Annual Affiliate Services Censuses (AASC); (j) Payments to the National Insurance Program; (k) Affiliate Risk Management Services, Inc. (ARMS) reports; 	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. - PPFA will provide a Rule 30(b)(6) witness to address the identified sub-topics (a)-(l) as they relate to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will provide a Rule 30(b)(6) witness to address the identified sub-topics (a)-(l) during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
			and (l) Affiliate Accounting and Reporting Standards Assessment and Planning Tools.	

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
30	PPFA's authority to revoke [Affiliate Defendant]'s status as a Planned Parenthood affiliate entity, the circumstances by which PPFA could exercise that authority, and any efforts by PPFA to revoke [Affiliate Defendant]'s status as a Planned Parenthood affiliate entity.	20	PPFA's authority to revoke its affiliation with a Planned Parenthood affiliate entity, and the circumstances by which PPFA exercises that authority.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants will each provide a Rule 30(b)(6) witness to address this Topic during the relevant date range.
31	PPFA's authority to impose Corrective Action Plans on [Affiliate Defendant], the circumstances by which PPFA could exercise that authority, and any efforts by PPFA to impose Corrective Action Plans on [Affiliate Defendant].	21	PPFA's authority to impose Corrective Action Plans on a Planned Parenthood affiliate entity, and the circumstances by which PPFA exercises that authority.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants will each provide a Rule 30(b)(6) witness to address this Topic during the relevant date range.
	N/A	22	The role of the Affiliate Quality Committee of the PPFA Board of Directors.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address this Topic during the relevant date range.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
33	Current or former PPFA employees, staff, contractors, directors, board members, and/or representatives of PPFA who serve or have served on the [Affiliate Defendant] Board of Directors and/or on any committee of the [Affiliate Defendant] Board of Directors.	23	Current or former PPFA employees, staff, contractors, directors, board members, and/or representatives of PPFA who serve or have served on the board of directors of a Planned Parenthood affiliate or related entity and/or on a committee of the board of directors of a Planned Parenthood affiliate or related entity.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to this Topic to the extent it is unduly vague with respect to what information is actually being sought regarding the "[c]urrent or former PPFA employees, staff, contractors, directors, board members, and/or representatives . . .". - PPFA will provide a Rule 30(b)(6) witness to address this Topic to the extent it seeks the names of current or former PPFA employees, directors, or board members who serve or have served on the board of directors of any of the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Each Affiliate Defendant will provide a Rule 30(b)(6) witness to address this Topic to the extent it seeks the names of current or former PPFA employees, directors, or board members who serve or have served on the board of directors of the Affiliate Defendant during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
32	Current or former [Affiliate Defendant] employees, staff, contractors, directors, board members, and/or representatives of [Affiliate Defendant] who serve or have served on the PPFA Board of Directors and/or on any committee of the PPFA Board of Directors.	24	Current or former Planned Parenthood affiliate employees, staff, contractors, directors, board members, and/or representatives a Planned Parenthood affiliate who serve or have served on the board of directors of PPFA or related entity and/or on a committee of the board of directors of PPFA or a related entity.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to this Topic to the extent it is unduly vague with respect to what information is actually being sought regarding the "[c]urrent or former [Affiliate Defendant] employees, staff, contractors, directors, board members, and/or representatives . . .". - PPFA will provide a Rule 30(b)(6) witness to address this Topic to the extent it seeks the names of current or former [Affiliate Defendant] employees, directors, or board members who serve or have served on the PPFA Board of Directors and/or any committee of the PPFA Board of Directors during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Each Affiliate Defendant will provide a Rule 30(b)(6) witness to address this Topic to the extent it seeks the names of current or former [Affiliate Defendant] employees, directors, or board members who serve or have served on the PPFA Board of Directors and/or any committee of the PPFA Board of Directors during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
	N/A	25	The creation and use of the PPFA Training and Orientation Grid.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range.
34	PPFA's relationships with [Affiliate Defendant]'s CEO, employees, staff, contractors, directors, board members, and/or other representatives of [Affiliate Defendant].	26	PPFA's relationships with Planned Parenthood affiliate CEOs, employees, staff, contractors, directors, board members, and/or other representatives of Planned Parenthood affiliate entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - This Topic is overly broad and burdensome given the timespan and the number of individuals identified. The term "relationships" is extremely vague and conceptually could cover every type of connection between Defendants and the individuals listed. Plaintiffs clarified that they would only seek information pertaining to "business relationships." - Defendants will each provide a Rule 30(b)(6) witness to generally address any such "business relationships" between PPFA and the Affiliate Defendants' employees, officers or directors during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
35	PPFA's provision of legal services, legal advice, and legal representation to [Affiliate Defendant].	27	PPFA's provision of legal services, legal advice, and legal representation to Planned Parenthood affiliate entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to this Topic to the extent it seeks information protected by the attorney-client privilege, attorney work product privilege, or any other applicable privilege. - Based on the potential breadth that this Topic could include, Defendants will each provide a Rule 30(b)(6) witness to address the Topic generally by providing non-privileged information concerning the provision of legal services by any PPFA employee to the Affiliate Defendants during the relevant date range. If there is specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.
36	PPFA's role in litigation involving or on behalf of [Affiliate Defendant].	28	PPFA's role in litigation involving or on behalf of Planned Parenthood affiliate entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to this Topic to the extent it seeks information protected by the attorney-client privilege, attorney work product privilege, or any other applicable privilege. - The phrase "role in litigation" is extremely vague. Defendants will provide a Rule 30(b)(6) witness to generally address PPFA's role in litigation involving the Affiliate Defendants by providing non-privileged information concerning the provision of legal services by any PPFA employee to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
37	[Affiliate Defendant]'s access to the PPFA Extranet, Intranet, and Affiliate Risk Management Services, Inc. (ARMS) website, and the content, documents and information on PPFA's Extranet, Intranet, and ARMS website concerning Medicaid.	29	PPFA's Extranet, Intranet, and Affiliate Risk Management Services, Inc. (ARMS) website, including the content, documents and information on PPFA's Extranet, Intranet, and ARMS website concerning Medicaid, Texas Medicaid, and/or Louisiana Medicaid, and the Planned Parenthood affiliate entities and individuals who can access the content, documents and information on PPFA's Extranet, Intranet, and ARMS website.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Based on the potential breadth that this Topic could include, Defendants will each provide a Rule 30(b)(6) witness to address the referenced subjects generally. If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
38	[Affiliate Defendant]'s involvement with ARMS and the submission of claims for reimbursement for services provided under Texas Medicaid and/or Louisiana Medicaid.	30	PPFA's involvement with ARMS and the submission of claims for reimbursement for services provided under Texas Medicaid and/or Louisiana Medicaid.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address PPFA's involvement with ARMS and the submission of claims for reimbursement for services provided under Texas Medicaid and/or Louisiana Medicaid. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address Affiliate Defendant's involvement with ARMS in connection with the Affiliate Defendant's submission of claims for reimbursement for services provided under Texas Medicaid and/or Louisiana Medicaid during the relevant date range. - If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
39	<p>[Affiliate Defendant]'s compliance programs, including but not limited to:</p> <p>(a) Compliance program oversight by a compliance officer, internal compliance committee, and board of directors;</p> <p>(b) Written standard of conduct and policies and procedures;</p> <p>(c) Compliance education and training for employees and contracted individuals;</p> <p>(d) Reporting mechanisms for communicating concerns and suspected violations of applicable laws or internal policies;</p> <p>(e) Routine auditing and monitoring of compliance-related areas of risk;</p> <p>(f) Investigations of allegations of non-compliance, and corrective action implemented; and/or</p> <p>(g) Uniform disciplinary action to properly address non-compliant behavior.</p>	31	<p>PPFA's involvement in compliance programs, including but not limited to:</p> <p>(a) Compliance program oversight by a compliance officer, internal compliance committee, and board of directors;</p> <p>(b) Written standard of conduct and policies and procedures;</p> <p>(c) Compliance education and training for employees and contracted individuals;</p> <p>(d) Reporting mechanisms for communicating concerns and suspected violations of applicable laws or internal policies;</p> <p>(e) Routine auditing and monitoring of compliance-related areas of risk;</p> <p>(f) Investigations of allegations of non-compliance, and corrective action implemented; and/or</p> <p>(g) Uniform disciplinary action to properly address non-</p>	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. This Topic is also overly broad and burdensome because, among other things, it encompasses compliance programs that have no relevance to Texas or Louisiana Medicaid, or any issues in the case. PPFA also objects to this Topic as overly broad and burdensome because it encompasses compliance programs that have no relation to the Affiliate Defendants. - PPFA will provide a Rule 30(b)(6) witness to address the identified topics (a)-(g) as they relate to PPFA's own compliance programs during the relevant date range. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address the identified topics (a)-(g) during the relevant date range. - If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
			compliant behavior.	

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
40	[Affiliate Defendant]'s policies and procedures for the prevention, detection and reporting of health care fraud and abuse, including but not limited to training provided to [Affiliate Defendant] staff for the prevention, detection and reporting of health care fraud and abuse.	32	PPFA's policies and procedures for the prevention, detection and reporting of health care fraud and abuse, including but not limited to training provided to PPFA staff and/or to staff of any Planned Parenthood affiliate or related entity for the prevention, detection and reporting of health care fraud and abuse.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. - PPFA will provide a Rule 30(b)(6) witness to address any training provided to PPFA staff and/or to staff of the Affiliate Defendants for the prevention, detection and reporting of health care fraud and abuse during the relevant date range. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address training provided to [Affiliate Defendant] staff for the prevention, detection and reporting of health care fraud and abuse during the relevant date range. - If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
N/A	N/A	33	PPFA's and/or the Planned Parenthood affiliates' Health Care Compliance Programs, including but not limited to compliance programs that focus on the prevention, detection, and correction of health care fraud and abuse, and documents, communications, and reports of program activities provided by a Health Care Compliance Officer to the board of directors, member of the board of directors, or committee of the board of directors of PPFA and/or board of directors of the Planned Parenthood affiliates.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. - PPFA will provide a Rule 30(b)(6) witness to address the identified Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
41	Reports of Health Care Compliance Program activities provided by a Health Care Compliance Officer to the [Affiliate Defendant] Board of Directors, member(s) of the [Affiliate Defendant] Board of Directors, and/or committee(s) of the [Affiliate Defendant] Board of Directors.	N/A	N/A	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Affiliate Defendants will produce a Rule 30(b)(6) witness to address reports of [Affiliate Defendant's] Health Care Compliance Program activities focused on prevention, detection, and correction of health care fraud and abuse related to [Affiliate Defendant's] Medicaid billings, Medicaid terminations or involvement in fetal tissue procurement or donation of health care compliance program activities provided by a Health Care Compliance Officer to the [Affiliate Defendant's] Board of Directors, member(s) of the [Affiliate Defendant's] Board of Directors, and/or committee(s) of the [Affiliate Defendant's] Board of Directors during the relevant date range. - If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.
42	[Affiliate Defendant]'s access to ARMS Connect and the Center for Affiliated Learning, including the content of the learning or training courses and materials on ARMS Connect and/or the Center for Affiliated Learning concerning Medicaid.	34	ARMS Connect and the Center for Affiliated Learning, including learning or training courses and materials on ARMS Connect and/or the Center for Affiliated Learning concerning Medicaid, Texas Medicaid, and/or Louisiana Medicaid, and the Planned Parenthood affiliate entities and individuals who can access the learning or training courses and	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address the identified topics as they relate to the Affiliate Defendants during the relevant date range. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address the identified topics during the relevant date range. - If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
			materials on ARMS Connect and/or the Center for Affiliated Learning.	
43	[Affiliate Defendant]'s access to the PPFA Medical Services blog, including the content of newly released materials, items of note, and information on the PPFA Medical Services Blog concerning Medicaid.	35	PPFA's Medical Services blog, including newly released materials, items of note, and information concerning Medicaid, Texas Medicaid, and/or Louisiana Medicaid on PPFA's Medical Services blog, and the Planned Parenthood affiliate entities and individuals who can access the content, documents and information on PPFA's Medical Services blog.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address the identified topics as they relate to the Affiliate Defendants during the relevant date range. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address the identified topics during the relevant date range. - If there is other specific information that Plaintiffs wish to address related to this Topic, Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
44	Financial support provided by PPFA to [Affiliate Defendant], and conditions precedent to PPFA's financial support of [Affiliate Defendant]	36	Financial support provided by PPFA to Planned Parenthood affiliates or related entities, and conditions precedent to PPFA's financial support of Planned Parenthood affiliates or related entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects that the term "related entities" is unduly vague because it does not identify any entity that Plaintiffs consider to be "related entities" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - Defendants object that the term "financial support" is unduly vague. - PPFA will provide a Rule 30(b)(6) witness to address grants and other awards of funds to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address grants and other awards of funds provided by PPFA to the Affiliate Defendant during the relevant date range and the conditions precedent to those grants or other awards of funds. If there is specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
45	Services provided by PPFA to [Affiliate Defendant], and conditions precedent to PPFA providing services to [Affiliate Defendant].	37	Services provided by PPFA to Planned Parenthood affiliates or related entities, and conditions precedent to PPFA providing services to Planned Parenthood affiliates or related entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects that the term "related entities" is unduly vague because it does not identify any entity that Plaintiffs consider to be "related entities" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - Defendants object that the term "services provided" is unduly vague because it does not define what is considered to be a service. - PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address at a high-level any services provided by PPFA to the Affiliate Defendant and the conditions precedent to that provision of services during the relevant date range. If there is specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
	PPFA's involvement with [Affiliate Defendant]'s communications with the media and/or the public, including but not limited to "Talking Points" for [Affiliate Defendant].	38	PPFA's involvement with Planned Parenthood affiliates or related entities communications with the media and/or the public, including but not limited to "Talking Points" for Planned Parenthood affiliates.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants objects to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. - PPFA also objects that the term "related entities" is unduly vague because it does not identify any entity that Plaintiffs consider to be "related entities" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. PPFA will provide a Rule 30(b)(6) witness to address the identified topics as they relate to PPFA's involvement with the Affiliate Defendants' communications with the media and/or the public during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will produce a Rule 30(b)(6) witness to address PPFA's involvement with the Affiliate Defendant's communications with the media and/or the public during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
47	Revenue-sharing arrangements and/or agreements between PPFA and [Affiliate Defendant].	39	Revenue-sharing arrangements and/or agreements between PPFA and Planned Parenthood affiliates or related entities.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects that the term "related entities" is unduly vague because it does not identify any entity that Plaintiffs consider to be "related entities" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - Defendants object to the use of the term "agreements" as being unduly broad in scope. - PPFA will provide a Rule 30(b)(6) witness to address revenue-sharing agreements made between PPFA and the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will provide a Rule 30(b)(6) witness to address revenue-sharing arrangements made between PPFA and the Affiliate Defendant during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
48	<p>Payments made to PPFA and/or any PPFA related entity (including but not limited to ARMS, Policyholders' Trust, Afaxys, Kaleido Health Systems, Planned Parenthood Direct) by [Affiliate Defendant] and/or any [Affiliate Defendant] related entity, including but not limited to:</p> <p>(a) Types of payments; (b) Amounts of payments; (c) Sources of payments; (d) Requirements of payments; (e) Timing of payments; (f) How payments are calculated; (g) The person(s) who makes payments; (h) The person(s) who receive payments; (i) Records reflecting payments; (j) How PPFA utilizes payments; and (k) Consequences for failure to make payments.</p>	40	<p>Payments made to PPFA and/or any PPFA related entity by Planned Parenthood affiliates or related entities, including but not limited to:</p> <p>(a) Types of payments; (b) Amounts of payments; (c) Sources of payments; (d) Requirements of payments; (e) Timing of payments; (f) How payments are calculated; (g) The person(s) who makes payments; (h) The person(s) who receive payments; (i) Records reflecting payments; (j) How PPFA utilizes payments; and (k) Consequences for failure to make payments.</p>	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. - PPFA objects that the terms "PPFA related entity" and Planned Parenthood "related entities" are unduly vague because they do not identify any entity that Plaintiffs consider to be a "PPFA related entity" or Planned Parenthood "related entities" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - PPFA will provide a Rule 30(b)(6) witness to address the identified sub-topics as they relate to PPFA and the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants also object that the term "[Affiliate Defendant] related entity" is unduly vague because it does not identify any entity that Plaintiffs consider to be a "[Affiliate Defendant] related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. Affiliate Defendants will produce a 30(b)(6) witness to address the Affiliate Defendants' payments made, if any, to PPFA and the other identified entities (ARMS, Policyholders' Trust, Afaxys, Kaleido Health Systems, and Planned Parenthood Direct) during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
49	Payments made to PPFA and/or any PPFA related entity of any monies or funds that were paid to or received by [Affiliate Defendant] and/or any [Affiliate Defendant] related entity from Texas Medicaid.	41	Payments made to PPFA and/or any PPFA related entity of any monies or funds that were paid to or received by any Planned Parenthood affiliate or related entity from Texas Medicaid.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object that the term "PPFA related entity" is unduly vague because it does not identify any entity that Plaintiffs consider to be a "PPFA related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants also object that the term "[Affiliate Defendant] related entity" is unduly vague because it does not identify any entity that Plaintiffs consider to be a "[Affiliate Defendant] related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. Affiliate Defendants will produce a 30(b)(6) witness to address payments made by each Affiliate Defendant to PPFA during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
50	Payments made to PPFA and/or any PPFA related entity of any monies or funds that were paid to or received by [Affiliate Defendant] and/or any [Affiliate Defendant] related entity from Louisiana Medicaid.	42	Payments made to PPFA and/or any PPFA related entity of any monies or funds that were paid to or received by any Planned Parenthood affiliate or related entity from Louisiana Medicaid.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object that the term "PPFA related entity" is unduly vague because it does not identify any entity that Plaintiffs consider to be a "PPFA related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. Defendants further object to the term affiliate "related entity" because it does not identify any entity that Plaintiffs consider to be an affiliate "related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants will produce a 30(b)(6) witness to address payments made by each Affiliate Defendant to PPFA during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
51	<p>Payments made to [Affiliate Defendant] and/or any [Affiliate Defendant] related entity by PPFA and/or any PPFA related entity, including but not limited to:</p> <ul style="list-style-type: none"> (a) Types of payments; (b) Amounts of payments; (c) Sources of payments; (d) Requirements of payments; (e) Timing of payments; (f) How payments are calculated; (g) The person(s) who makes payments; (h) The person(s) who receives payments; (i) Records reflecting payments; (j) How Planned Parenthood affiliates utilize payments; and (k) Consequences for failure to make payments. 	43	<p>Payments made to any Planned Parenthood affiliate or related entity by PPFA and/or any PPFA related entity, including but not limited to:</p> <ul style="list-style-type: none"> (a) Types of payments; (b) Amounts of payments; (c) Sources of payments; (d) Requirements of payments; (e) Timing of payments; (f) How payments are calculated; (g) The person(s) who makes payments; (h) The person(s) who receives payments; (i) Records reflecting payments; (j) How Planned Parenthood affiliates utilize payments; and (k) Consequences for failure to make payments. 	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object to the term "including but not limited to" because it does not describe what additional information Plaintiffs expect a 30(b)(6) witness to address and does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness with respect to such information. Defendants also object that the term "PPFA related entity" is unduly vague because it does not identify any entity that Plaintiffs consider to be a "PPFA related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. Defendants further object to the term affiliate "related entity" because it does not identify any entity that Plaintiffs consider to be an affiliate "related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - PPFA also objects that the term "related entity" of "Planned Parenthood" is unduly vague because it does not identify any entity that Plaintiffs consider to be such a related entity and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. PPFA will provide a Rule 30(b)(6) witness to address the identified sub-topics as they relate to PPFA and the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Each Affiliate Defendant will produce a 30(b)(6) witness to address payments made to that Affiliate Defendant by PPFA during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
52	<p>The Texas Health and Human Services Commission—Office of the Inspector General’s (“HHSC-OIG”) October 2015 decision to initiate termination proceedings against one or more of the following Planned Parenthood affiliates:</p> <p>(a) Planned Parenthood Gulf Coast, Inc.; (b) Planned Parenthood of Greater Texas, Inc.; (c) Planned Parenthood South Texas, Inc.; (d) Planned Parenthood Cameron County, Inc.; and (e) Planned Parenthood San Antonio, Inc.</p>	44	<p>The Texas Health and Human Services Commission—Office of the Inspector General’s (“HHSC-OIG”) October 2015 decision to initiate termination proceedings against one or more of the following Planned Parenthood affiliates:</p> <p>(a) Planned Parenthood Gulf Coast, Inc.; (b) Planned Parenthood of Greater Texas, Inc.; (c) Planned Parenthood South Texas, Inc.; (d) Planned Parenthood Cameron County, Inc.; and (e) Planned Parenthood San Antonio, Inc.</p>	<p><u>Scope</u> - Defendants will each provide a 30(b)(6) witness to testify on this Topic.</p>

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
53	The Texas Health and Human Services Commission—Office of the Inspector General’s (“HHSC-OIG”) initiation of termination proceedings in October 2015 against one or more of the Planned Parenthood affiliates, litigation in federal and state courts concerning termination of the Planned Parenthood affiliates from Texas Medicaid, and PPFA’s role and involvement in litigation concerning the termination from Texas Medicaid.	45	The Texas Health and Human Services Commission—Office of the Inspector General’s (“HHSC-OIG”) initiation of termination proceedings in October 2015 against one or more of the Planned Parenthood affiliates, litigation in federal and state courts concerning termination of the Planned Parenthood affiliates from Texas Medicaid, and PPFA’s role and involvement in litigation concerning the termination from Texas Medicaid.	<u>Scope</u> - Defendants will each provide a 30(b)(6) witness to testify on this Topic.
54	The Louisiana Department of Health’s September 2015 decision to initiate termination proceedings against the Planned Parenthood affiliates, litigation in federal and state courts concerning termination of the Planned Parenthood affiliates from Louisiana Medicaid, and PPFA’s role and involvement in litigation	46	The Louisiana Department of Health’s September 2015 decision to initiate termination proceedings against the Planned Parenthood affiliates, litigation in federal and state courts concerning termination of the Planned Parenthood affiliates from	<u>Scope</u> - Defendants will each provide a 30(b)(6) witness to testify on this Topic.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
	concerning the termination from Louisiana Medicaid.		Louisiana Medicaid, and PPFA's role and involvement in litigation concerning the termination from Louisiana Medicaid.	
55	55. [Affiliate Defendant]'s communications with PPFA concerning the matters described in paragraphs 52-54 above.	N/A	N/A	<p><u>Scope</u></p> <p>- Affiliate Defendants will each provide a 30(b)(6) witness to testify on this Topic regarding non-privileged communications.</p>
56	[Affiliate Defendant]'s claims for reimbursement submitted to Texas Medicaid and Louisiana Medicaid for services rendered between January 1, 2010 and March 12, 2021.	47	PPFA's knowledge of claims for reimbursement submitted to Texas Medicaid and Louisiana Medicaid by the PPFA Affiliates for services rendered between January 1, 2010 and March 12, 2021.	<p><u>Date Range:</u></p> <p>- Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021.</p> <p>- Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021.</p> <p><u>Scope:</u></p> <p>- PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity.</p> <p>- Affiliate Defendants will each provide a 30(b)(6) witness to testify on this Topic.</p>

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
N/A	N/A	48	PPFA's knowledge of the PPFA Affiliates' receiving and retaining payments from Texas Medicaid and Louisiana Medicaid for services rendered between January 1, 2010 and March 12, 2021.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity.
57	[Affiliate Defendant]'s knowledge of whether payments from Texas Medicaid and Louisiana Medicaid for services rendered between January 1, 2010 and March 12, 2021 have been refunded or repaid to Texas Medicaid and Louisiana Medicaid.	49	PPFA's knowledge of whether payments from Texas Medicaid and Louisiana Medicaid for services rendered between January 1, 2010 and March 12, 2021 have been refunded or repaid to Texas Medicaid and Louisiana Medicaid.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA will provide a Rule 30(b)(6) witness to address this Topic as it relates to the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Each Affiliate Defendant will provide a 30(b)(6) witness to testify on this Topic.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
N/A	N/A	50	PPFA's knowledge of whether payments received under state or federal programs by PPFA or any of PPFA's affiliated or related entities were paid back to the government.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - PPFA objects that the term "affiliated or related entities" of PPFA is unduly vague because it does not identify any entities that Plaintiffs consider to be related to PPFA and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. In addition, the receipt of payments under any "state or federal programs" is both vague and not relevant to the issues in this case. - PPFA will provide a Rule 30(b)(6) witness to address this Topic to the extent it involves Medicaid payments received by PPFA or any of the Affiliate Defendants during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity.

Affiliate Topic No.	Affiliate Topic Description	PPFA Topic No.	PPFA Topic Description	Defendants' Meet-and-Confer Position
58	PPFA's indemnification of [Affiliate Defendant] and/or any [Affiliate Defendant] related entity for acts or omissions arising from participation in, or any payments received from, any state or federal program.	51	PPFA's indemnification of any of PPFA's affiliated or related entities for acts or omissions arising from participation in, or any payments received from, any state or federal program.	<p><u>Date Range:</u></p> <ul style="list-style-type: none"> - Relator has agreed to limit the relevant timeframe for this Topic to January 1, 2010 - February 5, 2021. - Texas stated that it would consider our proposal to limit the timeframe for this Topic to February 5, 2015 - February 5, 2021. <p><u>Scope:</u></p> <ul style="list-style-type: none"> - Defendants object that the reference to "participation in, or any payments received from, any state or federal programs" is both vague and not relevant to the issues in this case. - PPFA also objects that the term PPFA "related entities" is unduly vague because it does not identify any entity that Plaintiffs consider to be PPFA "related entities" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - PPFA will provide a Rule 30(b)(6) witness to address this Topic to the extent it relates to any of the Affiliate Defendant's receipt of Medicaid reimbursements during the relevant date range. If there is other specific information that Plaintiffs wish to address related to this Topic, PPFA requests that Plaintiffs identify it with reasonable particularity. - Affiliate Defendants object to the term affiliate "related entity" because it does not identify any entity that Plaintiffs consider to be an affiliate "related entity" and thus does not provide an adequate opportunity to reasonably prepare a 30(b)(6) witness to address this subject. - Affiliate Defendants will produce a 30(b)(6) witness to address this Topic to the extent it relates to the Affiliate Defendant's participation in Medicaid. If there is other specific information that Plaintiffs wish to address related to this Topic, Affiliate Defendants request that Plaintiffs identify it with reasonable particularity.